

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) INDICTMENT CR 09-325 DSD/JJG
)
Plaintiff,) (18 U.S.C. § 2)
) (18 U.S.C. § 1028A)
v.) (18 U.S.C. § 1029(a)(2))
) (18 U.S.C. § 1344)
JASON ALAN TAUER,)
)
Defendant.)

THE UNITED STATES GRAND JURY CHARGES THAT:

Introduction

At all times relevant to this Indictment:

1. Defendant, JASON ALAN TAUER, was a resident of the District of Minnesota.

2. From March 15, 2005, through April 29, 2005, defendant, Jason Alan Tauer, was employed at Ameriquest Mortgage Company as a Mortgage Associate.

3. US Bank was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the State of Minnesota.

4. Capitol One was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the State of Minnesota.

5. Wells Fargo Bank was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the State of Minnesota.

6. TCF Bank was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the

(1)

FILED NOV 03 2009
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State of Minnesota.

7. Twin City Co-Ops Federal Credit Union was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the State of Minnesota.

8. Bank of America was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the State of Minnesota.

9. JP Morgan Chase was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the State of Minnesota.

10. American Express was a financial institution, as defined by Title 18, United States Code, Section 20, and conducted business in the State of Minnesota.

11. Ameriquest Mortgage was a mortgage brokerage firm doing business in the State of Minnesota.

Purpose of the Scheme and Artifice to Defraud

12. The purpose of the scheme and artifice to defraud was to obtain cash from the bank accounts of victims at financial institutions by obtaining the personal identification information from Ameriquest Mortgage files, stolen mail, and theft of personal items from gym lockers.

Manner and Means of the Artifice to Defraud

13. It was part of the scheme and artifice to defraud that

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while employed at Ameriquest Mortgage Company the defendant, Jason Alan Tauer, accessed, without authorization, mortgage files of individuals who had previously applied for loans. The defendant, Jason Alan Tauer, also unlawfully took the mortgage files of over 93 individuals.

14. It was further part of the scheme and artifice to defraud that the defendant unlawfully used the personal identification information belonging to various victims which was contained in the Ameriquest Mortgage Company files to create fraudulent identifications and counterfeit checks.

15. It was further part of the scheme and artifice to defraud that the defendant used this personal identification information to apply for, and receive, credit cards, and credit card access checks from financial institutions. The defendant then unlawfully used these fraudulently obtained credit cards, and credit card access checks, to obtain products, services, cash, and other items of value.

16. It was further part of the scheme and artifice to defraud that the defendant used these fraudulent identifications and counterfeit checks that he created to withdraw monies from bank accounts at financial institutions, in the State of Minnesota, without the permission of the account holders.

17. It was further part of the scheme and artifice to defraud

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that the defendant used stolen checks to withdraw monies from bank accounts at financial institutions, in the State of Minnesota, without the permission of the account holders.

18. By executing this scheme and artifice to defraud, between June 1, 2005, and April 1, 2008, the defendant, and others known and unknown to the grand jury, unlawfully obtained more than \$150,000 from US Bank, Capital One, Wells Fargo Bank, TCF Bank, Twin City Co-Ops Federal Credit Union, Bank of America, Bremer Bank, M & I Bank, and others. The defendant attempted to obtain additional amounts of cash from accounts at MBNA, Citibank, and Guaranty Bank.

COUNTS 1-19
(Bank Fraud)

19. The grand jury incorporates by reference paragraphs 1 through 18 as if fully stated herein.

20. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendant,

JASON ALAN TAUER,

aided and abetted by others known and unknown to the grand jury, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud financial institutions and to obtain, by means of false and fraudulent pretenses and representations, money and funds owned by and under the custody and control of various financial institutions, as set forth in each

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count below, including but limited to:

COUNT	DATE(S)	FINANCIAL INSTITUTION	DESCRIPTION OF TRANSACTION
1	8/1/05-8/25/05	Capitol One	Withdrew \$3,000 from account of W.J. using fraudulent bank card
2	8/16/05-12/29/05	US Bank	Withdrew \$6,500 from accounts of W.B. using fraudulent identification
3	11/15/05-12/1/05	US Bank	Withdrew \$6,350 from account of P.K. using fraudulent identification
4	1/27/06-1/31/06	Capital One	Withdrew \$3,000 from account of W.H. using credit card access checks
5	1/27/06-2/1/06	Wells Fargo	Withdrew \$5,500 from account of J.S. using fraudulent identification
6	2/17/06-10/17/06	US Bank	Withdrew \$30,529.63 from account of D.G. using a fraudulently obtained bank card
7	3/8/06-3/29/06	Wells Fargo	Withdrew \$13,000 from account of E.T. using fraudulent identification
8	7/26/06	Bank of America	Withdrew \$9,000 from account of D.W. using stolen checks
9	11/1/06	Wells Fargo	Withdrew \$3,500 from account of J.P. using a stolen check
10	12/18/06-12/19/06	US Bank	Withdrew \$3,100 from account of M.A. using counterfeit check
11	4/7/07-4/12/07	US Bank	Withdrew \$6,000 from account of J.L. using fraudulent identification
12	6/5/07-7/15/07	US Bank	Withdrew \$4,000 from account of C.K. using counterfeit checks
13	6/7/07-6/9/07	TCF Bank	Withdrew \$3,000 from account of S.M. using fraudulent identification
14	6/20/07-7/18/07	Wells Fargo	Withdrew \$11,000 from account of W.C. using fraudulent identification
15	9/26/07-9/27/07	Wells Fargo	Withdrew \$3,000 from account of M.M. using fraudulent identification
16	10/9/07-10/23/07	Twin City Co-Ops C.U.	Withdrew \$4,000 from account of W.R. using fraudulent identification

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17	11/10/07- 11/28/07	Wells Fargo	Withdrew \$3,900 from account of T.M. using counterfeit checks
18	11/14/07- 11/28/07	US Bank	Withdrew \$5,500 from account of G.C. using counterfeit checks
19	1/7/08- 1/8/08	US Bank	Withdrew \$3,000 from account of J.C. using fraudulent identification

All in violation of Title 18, United States Code, Sections 1344 and 2(a).

COUNTS 20-22
(Access Device Fraud)

21. The grand jury incorporates by reference paragraphs 1 through 18 as if fully stated herein.

22. On or about the dates set forth below, in the State and District of Minnesota, the defendant,

JASON ALAN TAUER,

aided and abetted by others known and unknown to the grand jury, did knowingly and with intent to defraud, use one or more unauthorized access devices, namely bank credit cards, during a one-year period, and by such conduct, obtained a thing of value aggregating \$1,000 or more during that period, to wit:

COUNT	DATES (on or about)	BANK	AMOUNT	DESCRIPTION
20	6/14/05- 9/20/05	Capital One	\$2,093	Used fraudulently obtained Capital One card in name of E.P.
21	10/5/05 - 10/10/05	JP Morgan Chase	\$3,350	Used stolen credit card access checks in name of B.M.

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22	2/26/08- 3/27/08	American Express	\$3,868	Used stolen American Express credit card in name of D.Y.
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All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2(a).

COUNTS 23-33
(Aggravated Identity Theft)

23. On or about the dates set forth below, in the State and District of Minnesota, the defendant,

JASON ALAN TAUER,

aided and abetted by others known and unknown to the grand jury, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: name, date of birth, and social security number, belonging to victims, as alleged below, during and in relation to the commission of felony violations, to wit:

COUNT	DATES (on or about)	DESCRIPTION
23	8/1/05	Unlawful use of name, date of birth, and social security number of victim W.J. during and in relation to commission of Bank Fraud as alleged in Count 1
24	8/16/05- 12/29/05	Unlawful use of name and date of birth of victim W.B. during and in relation to commission of Bank Fraud as alleged in Count 2
25	11/15/05- 12/1/05	Unlawful use of name and date of birth of victim P.K. during and in relation to commission of Bank Fraud as alleged in Count 3

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26	1/27/06- 2/1/06	Unlawful use of name and date of birth of victim J.S. during and in relation to commission of Bank Fraud as alleged in Count 5
27	2/17/06- 19/17/06	Unlawful use of name and date of birth of victim D.G. during and in relation to commission of Bank Fraud as alleged in Count 6
28	3/8/06- 3/29/06	Unlawful use of name and date of birth of victim E.T. during and in relation to commission of Bank Fraud as alleged in Count 7
29	7/26/06	Unlawful use of name and account number of victim D.W. during and in relation to commission of Bank Fraud as alleged in Count 8
30	4/7/07- 4/12/07	Unlawful use of name and date of birth of victim J.L. during and in relation to commission of Bank Fraud as alleged in Count 11
31	6/20/07- 7/18/07	Unlawful use of name and date of birth of victim W.C. during and in relation to commission of Bank Fraud as alleged in Count 14
32	11/14/07- 11/28/07	Unlawful use of name, date of birth, and account number of victim G.C. during and in relation to commission of Bank Fraud as alleged in Count 18
33	2/26/08- 3/27/08	Unlawful use of name and account number of victim D.Y. during and in relation to commission of Access Device Fraud as alleged in Count 22

All in violation of Title 18, United States Code, Sections 1028A, and 2(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON